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11 Attorneys for Defendant
12 JQD, LLC dba PRO SOLUTIONS,
13 A California limited company,
14

15 CHRISTOPHER D. TERRELL, an
16 individual,

17 Plaintiff,

v.

18 JQD, LLC dba PRO SOLUTIONS, a
19 California limited liability company,

20 Defendants.

21 Case No.: 3:17-CV-05626 RS

22 **STIPULATION TO TERMINATE
23 LITIGATION AND [PROPOSED] ORDER**

24 Plaintiff CHRISTOPHER D. TERRELL and Defendant JQD, LLC dba PRO
25 SOLUTIONS, come before the Court and stipulate as follows:

26 In the mutual interest of terminating this litigation, Defendant agrees to waive its pending
27 Bill of Costs as prevailing party (Dkt. #70), in consideration and exchange for plaintiff's
28 agreement to waive his rights to appeal in this case, including the right to appeal the Court's
rulings on the parties' motions for Summary Judgment and Partial Summary Judgment.

Accordingly, Defendant withdraws its Bill of Costs.

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1 **IT IS SO STIPULATED.**

2 Date: January 23, 2019

DELTA LAW GROUP

3 By:/s/ JIM G. PRICE

4 Jim G. Price
5 Attorneys for Plaintiff
6 Christopher D. Terrell

7 Date: January 23, 2019

WILSON ELSER MOSKOWITZ EDELMAN &
8 DICKER LLP

9 By: /s/ FRANCIS TORRENCE

10 Francis Torrence
Donald P. Sullivan
Attorneys for Defendant JQD, LLC dba Pro
11 Solutions, a California limited company

ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED

Dated: January 23, 2019



RICHARD SEEBORG
United States District Court Judge